



02-01R-0341

U.S. Department of Energy
Office of River Protection
Contract Management Division
Mr. Michael K. Barrett
Contracting Officer
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

CCN: 035136

JUL 18 2002

Dear Mr. Barrett:

**CONTRACT NO. DE-AC27-01RV14136 – TRANSMITTED FOR INFORMATION-
BECHTEL NATIONAL, INC. REVISED FINDING RESPONSES FOR IR-01-006-02-FIN
AND IR-02-002-01-FIN**

- References: 1) CCN 029862, Letter, A. R. Veirup, BNI, to M. K. Barrett, ORP, "Bechtel National Inc. Response to Safety Integration Assessment Report, IR-02-002," dated March 11, 2002.
- 2) CCN 029106, Letter, A. R. Veirup, BNI, to M. K. Barrett, ORP, "Bechtel National Inc. Response to Standards Selection Process Report, IR-01-006," dated February 28, 2002.

In the two referenced letters, Bechtel National, Inc. (BNI) offered responses to the U.S. Department of Energy, Office of Safety Regulation (OSR) for the titled Findings. The closure date for Finding IR-01-006-02-FIN was July 1, 2002, and the closure date for IR-02-002-01-FIN was June 30, 2002. Although these closure dates have not been met, Findings and Corrective Action Reports (CARs) not closed, the corrective actions for the original findings are essentially complete. The IR-01-006-02-FIN corrective actions are complete for Low Activity Waste (LAW) and High Level Waste (HLW). However, BNI has elected to address and include the Pretreatment (PT) facility in the closure. The IR-02-002-01-FIN corrective actions were addressed by the due date and only a procedure change remains to complete closure. This letter establishes new finding/CAR closure dates for OSR's information.

IR-01-006-02-FIN cited BNI as follows:

"Appendix A, Section 5.0, "Development of Control Strategies," of the SRD requires the following information produced by the control strategy definition to be recorded in the hazard database:

- a. *Rationale for preferred control strategy selection*
- b. *Estimate of the consequences from the mitigated event*
- c. *Estimate of the mitigated event frequency*

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Contrary to the above, as of September 13, 2001, the Contractor's hazard database [i.e., the Standards Identification Process Database (SIPD)] did not include a rationale for the selection of preferred control strategies, mitigated event frequencies, or mitigated event consequences (i.e., dose values). The SIPD database did not contain a field for entry of the rationale for the selection of preferred control strategies."

BNI responded to the finding as follows:

"BNI agrees there is no column in the SIPD database reserved specifically for references to the control strategy selection. However, BNI points out that SIPD currently references supporting material in a "Links" field. The supporting material contained in this field links individual Control Strategy Development (CSD) records to the Safety Implementation notebooks, meeting minutes, and appropriate calculations serving as the basis for CSD information.

BNI will continue to identify reference material in this manner including references to the control selection process. The CSD record will identify, when required, the specific location or reference(s) relevant to the Control Strategy Element selection process (CSD Notes Field). Examples of references will be specific calculations, meeting minutes number, and specific sections of volumes.

Estimate of the consequences from the mitigated event and estimates of the mitigated event frequency are found in the calculations for Design Basis Events (DBEs) which will be referenced within the bounded CSD records.

BNI will identify for each SIPD CSD record when the control strategy is either "obvious" or "self-evident" (in the CSD Notes Field)."

As of the date of this letter, BNI is still working on corrective actions associated with SIPD deficiencies. The finding and CAR require three items to be completed:

- (a) each CSD record needs to be linked to relevant meeting minutes, etc. indicating the bases for the record,
- (b) each CSD record needs to be associated with a corresponding DBE, and
- (c) each CSD record needs to indicate the rationale for the selected control strategy.

So far, items (a), (b), and (c) are completed for the approved set of HLW, LAW, and Balance of Facility CSD records. Item (a) is completed for the approved set of PT CSD records. Item (b) is not complete for any of the PT CSD records. The association of individual records to the DBEs could not be done until the DBEs themselves were identified, analyzed, and approved by the Integrated Safety Management teams. This process was not completed until May. Individual CSD records for Severity Level 1, 2, and 3 events will be associated with the DBEs by August 12, 2002. Item (c) is 95% complete for the PT facility. The records remaining non-compliant with item (c) will require further consultation and discussion with the Operations and

Engineering organizations to identify acceptable control strategies. The current strategies identify only a single physical barrier when two are required. A separate CAR (CAR-QA-02-134) has been issued to correct this deficiency. The new closure date for finding IR-01-006-02-FIN is August 12, 2002.

IR-02-002-01-FIN cited BNI as follows:

"The ISMP Section 3.16.1.1 requires the Contractor to have a Project Safety Committee (PSC). The inspectors compared the functions of the PSC, as listed in Section 3.2 of the "Project Safety Committee" procedure, to activities recorded in PSC approved meeting minutes, to verify all the functions of the PSC had been implemented. The inspectors determined the PSC was not reviewing the following as required by the procedure:

- Results from the Safety Improvement Program,*
- Identification, resolution, and implementation of recommendations and corrective actions resulting from nonconforming items or activities, incident investigations, audits and assessments, inspection and reviews, or emergency exercises,*
- Reports covering such topics as proposed RPP-WTP modifications, emergency exercises, and the implementation of findings from management assessments,*
- Performance indicators and trends of the RPP-WTP for worker, public, and environmental safety activities.*

Interviews with the PSC Chair and Co-Chair confirmed these items were not being reviewed. Based on the inspectors determination, the Contractor documented this deficiency in 24590-WTP-CAR-QA-01-007, dated January 10, 2002.

The failure to follow the PSC procedure, which implemented the commitments of the ISMP, was considered a Finding (IR-02-002-01-FIN)."

BNI responded to the finding as follows:

"To avoid further Findings procedure 24590-WTP-GPP-SREG-001, "Project Safety Committee", will be revised as follows:

- An individual PSC member will be assigned to each activity and safety related document identified as a review item for the PSC. The PSC member will be responsible for ensuring assigned items are reviewed by the PSC as required by the procedure. Activities that are not applicable to construction will not have a PSC member assigned at this time.*
- A schedule for PSC review of each item will be included. The schedule will have the review items assigned frequencies of "quarterly" and "as needed", as appropriate. Activities that are not related to construction will not be scheduled at this time.*

All areas that the PSC is responsible to review and are applicable to construction activities will be reviewed at least once by June 30, 2002. Activities that are scheduled on an "as needed" basis will be reviewed when they arise."

As of the date of this letter, BNI has completed the committed activities except for certain topical review areas that had been determined by PSC to be appropriate on an "as-needed" basis. Several of these topical areas will be changed to "as-needed" from "quarterly" in a revision to 24590-WTP-GPP-SREG-001, *Project Safety Committee*.

The new closure date for this finding is July 18, 2002.

Should you have any questions, please call Mr. Bill Spezialetti at (509)371-4654.

Very truly yours,



A. R. Veirup
Prime Contract Manager

MAP/slr

cc:

Barr, R. C.	OSR	H6-60
Beranek, F.	WTP	MS6-P1
Betts, J. P.	WTP	MS4-A1
DOE Correspondence Control	ORP	H6-60
Erickson, L.	ORP	H6-60
Naventi, R. F.	WTP	MS4-A1
PDC	WTP	MS5-K.1
Platt, M. A.	WTP	MS6-R1
Poulson, B.	WTP	MS4-A2
Schwier, J. E. om 7/18/02	ORP	H6-60
Shell, G. T.	WTP	MS4-A2
Spezialetti, W. R.	WTP	MS6-P1
Struthers, D. J.	ORP	H6-60
Swalles, J. H.	ORP	H6-60
Taylor, W. J.	ORP	H6-60
Veirup, A. R.	WTP	MS4-A1
Ollerio, J. E.	ORP	H6-60